

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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CAN'T STOP PRODUCTIONS, INC.,

Case No.: 7:17-cv-06513-CS

Plaintiffs,

-against-

SIXUVUS, LTD., ERIC ANZALONE,  
ALEXANDER BRILEY, FELIPE ROSE,  
JAMES F. NEWMAN, RAYMOND  
SIMPSON, and WILLIAM WHITEFIELD,

Defendants.

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**DECLARATION OF GARY ADELMAN IN SUPPORT OF DEFENDANT'S**  
**MOTION FOR A TEMPORARY RESTRAINING ORDER AND A**  
**PRELIMINARY INJUNCTION**

GARY ADELMAN, pursuant to 28 U.S.C. § 1746, declares under the penalty of perjury, as follows:

1. I am an attorney for the Defendants/Counterclaim Plaintiff in this action and submit this declaration in support of Defendants/Counterclaim Plaintiff's motion for a temporary restraining order and a preliminary injunction.
2. Annexed hereto as Exhibit 1 is a true and correct copy of the Declaration of Henri Belolo, without exhibits, dated May 24, 2010 in the United States Patent and Trademark Office Trademark Trial and Appeal Board Cancellation Proceeding between Karen L. Willis and Can't Stop Productions, Inc. Number 92051215.
3. Annexed hereto as Exhibit 2 is a true and correct copy of a screenshot of [www.officialvillagepeople.com](http://www.officialvillagepeople.com), last accessed on November 29, 2017.
4. Annexed hereto as Exhibit 3 is a true and correct copy of screenshot of social media posts from Facebook and Twitter, all last accessed on November 29, 2017.
5. Annexed hereto as Exhibit 4 is a true and correct copy of videos of Victor Willis' recent performances.
6. Annexed hereto as Exhibit 5 is a true and correct copy of videos of a Sixuvus performance.
7. Annexed hereto as Exhibit 6 is a true and correct copy of an article regarding from <http://www.margaretcourtarena.com.au/events/kc-the-sunshine-band-village-people/> last accessed on November 30, 2017.
8. Annexed hereto as Exhibit 7 is a true and correct copy of screenshot of Victor Willis' social media pages from Facebook and Twitter, all last accessed on November 30, 2017.

9. No prior application for this relief has been requested by Defendant.

10. On November 29, 2017, we contacted Plaintiff's counsel to tell them we were making this application.

Executed on November 30, 2017, in New York, New York.



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GARY ADELMAN